

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

JANINE ALI,

Plaintiff,

v.

ELI LILLY AND COMPANY, an Indiana
corporation,

Defendant.

CASE NO. 1:14-CV-01615

**DECLARATION OF BRETT C. REYNOLDS IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS**

1. I, Brett C. Reynolds, declare as follows pursuant to 28 U.S.C. § 1746: I am an attorney at the law firm of Covington & Burling LLP, counsel for Defendant Eli Lilly and Company ("Lilly"). I am a member in good standing of the bars of the State of Illinois and the District of Columbia, and I am admitted *pro hac vice* in this litigation. I have personal knowledge of the facts set forth in this Declaration, which I make to place before the Court documents and information relevant to its determination of Lilly's Opposition to Plaintiffs' Motion for Sanctions.

2. Attached hereto as Exhibit 1 is a true and accurate copy of an Order and Record of Proceedings from the Arlington Juvenile and Domestic Relations Court, dated September 18, 2012.

3. Attached hereto as Exhibit 2 is a true and accurate copy of excerpts from the transcript of the April 8, 2015 deposition of Janine Ali.

4. Attached hereto as Exhibit 3 is a true and accurate copy of an April 14, 2015 Email from P. Miller to B. Stekloff.


5. Attached hereto as Exhibit 4 is a true and accurate copy of a June 4, 2015 Email from B. Wisner to B. Stekloff.

6. Attached hereto as Exhibit 5 is a true and accurate copy of excerpts from the transcript of the June 1, 2015 deposition of Dr. Joseph Glenmullen.

7. Attached hereto as Exhibit 6 is a true and accurate copy of excerpts of Lilly's Objections to Ali's Requests for Production, dated February 23, 2015.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 10, 2015 in Washington, D.C.



Brett C. Reynolds